

# **Exhibit C**

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October 11, 2018

*Via Electronic Mail*

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Re: *In re Dealer Management Systems Antitrust Litigation*, MDL No. 2817

Dear Matt:

Thank you for your October 9, 2018 letter regarding CDK's designations of certain documents as Highly Confidential. We appreciate CDK's willingness to de-designate 12 of the documents identified in our letter from Highly Confidential to Confidential. However, except as described below, for the remainder of the documents we continue to believe a Confidential designation is appropriate.

After further review, it appears that five of the documents identified in our September 24 letter have been produced to MDL Plaintiffs with a Confidential designation. Please confirm that the following documents are no longer designated Highly Confidential (and, as such, are no longer at issue):

CDK-2053730  
CDK-1861079  
CDK-0189798  
CDK-0230616  
CDK-0235305

Additionally, in the interest of compromise, we will withdraw our challenges regarding your Highly Confidential designations for CDK-1203686 and CDK-0035959.

As to the remaining documents, and as set forth in our September 24 letter, CDK's Highly Confidential designations appear to be nothing more than a thinly-veiled attempt to limit the use of documents that are damaging to CDK's claims and defenses in this litigation.

Disclosure of these documents would not pose a risk of “significant harm,” as contemplated by the Confidentiality Order. Indeed, CDK has designated Highly Confidential certain documents that have already been exchanged with dealers, vendors, and/or other third parties. For instance, CDK-0689619 is a template of a letter sent to application vendors in March 2015. *See also* CDK-1138147; CDK-0797233; CDK-0032559; CDK-0224081.

We look forward to speaking with you this afternoon during our meet-and-confer.

/s/ Elizabeth McKenna  
Elizabeth McKenna

/s/ Joshua Hafenbrack  
Joshua Hafenbrack